

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

*In re Center for Vein Restoration Data Breach
Litigation*

Civil Action No. 1:24-cv-03593

**PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs, Aida Khalil, Edward Cameron, Jessica Kayrouz, Katrina Kelley, Lee Conrad, Patricia Knott, Colleen Baird, Gary Scott, Marie E. Wengert, Carla Jackson, and Barbara Voron, individually, and on behalf of others similarly situated, hereby file their Unopposed Motion for Preliminary Approval of Class Action Settlement, requesting the Court enter an order:

1. Preliminarily approving the Settlement described in the Settlement Agreement¹ between Plaintiffs and Defendant, and the attachments thereto, as fair, reasonable, and adequate;
2. Provisionally certifying the Settlement Class pursuant to Rule 23 for settlement purposes only;
3. Approving the Notice Program set forth in the Agreement, including the form and content of the Notices attached to the Agreement as Exhibits 1 and 2;
4. Approving the Claim Process set forth in the Agreement, including the form and content of the Claim Form attached to the Agreement as Exhibit 3.
5. Designating Plaintiffs as Class Representatives for settlement purposes;

¹ The capitalized terms herein shall have the same meanings as those defined in the Settlement Agreement attached as Exhibit A to Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of Class Action Settlement ("Memorandum").

6. Appointing Jeff Ostrow of Kopelowitz Ostrow P.A., David K. Lietz of Milberg Coleman Bryson Phillips Grossman, PLLC, A. Brooke Murphy of Murphy Law Firm, and Andrew J. Shamis of Shamis Gentile Class Action Law Firm as Class Counsel for settlement purposes;

7. Appointing Epiq Class Action & Claims Solutions, Inc. as the Settlement Administrator;

8. Approving the opt-out and objection procedures outlined in the Agreement;

9. Staying this Action or otherwise adjourning litigation deadlines pending Final Approval of the Settlement;

10. Staying and/or enjoining, pending Final Approval of the Settlement, any actions brought by Settlement Class Members concerning a Released Claim; and

11. Scheduling a Final Approval Hearing for the week of November 3, 2025, or soon thereafter at the Court's convenience, at which the Court will conduct an inquiry into the fairness of the Settlement, Final Approval of the Settlement, and consideration of Settlement Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards for the Class Representatives.

This Motion is based upon: (1) this Motion; (2) the Memorandum; (3) the Settlement Agreement (attached to the Memorandum as Exhibit A) (4) the Joint Declaration of Class Counsel (attached to the Memorandum as Exhibit B) (5) the Notices and Claim Form (attached to the Settlement Agreement); (6) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement (attached as Exhibit C to the Memorandum); (7) the records, pleadings, and papers filed in this action; and (8) such other documentary and oral evidence or argument as may be presented to the Court in support of this Motion for Preliminary Approval.

Defendant does not oppose the relief requested in this Motion for Preliminary Approval.

Dated: May 6, 2025.

Respectfully submitted,

/s/ Jeff Ostrow

Jeff Ostrow

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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2025, I electronically filed the foregoing document using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/ Jeff Ostrow